

PHILLIP A. TALBERT
Acting United States Attorney
KEVIN C. KHASIGIAN
Assistant U. S. Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$879,643.00 IN
U.S. CURRENCY,

ASSORTED MONEY ORDERS VALUED
AT \$6,000.00 IN U.S. CURRENCY,

Defendants.

2:21-MC-00097-MCE-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimants Maria Gonzalez Sanchez and Jose Luis Mendoza Castillo (“claimants”), by and through their respective counsel, as follows:

1. On or about January 3, 2021 and January 11, 2021, claimants filed claims in the administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the Approximately \$879,643.00 in U.S. Currency and Assorted Money Orders valued at \$6,000.00 in U.S. Currency (hereafter collectively “defendant funds”), which were seized on or about October 1, 2020.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
2 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
3 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
4 That deadline is April 2, 2021.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July
6 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
7 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
10 alleging that the defendant funds are subject to forfeiture shall be extended to July 1, 2021.

11 Dated: 3/31/2021

PHILLIP A. TALBERT
Acting United States Attorney

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13 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

14 Dated: 3/30/2021

/s/ Kenneth Rosenfeld
KENNETH ROSENFELD
Attorney for potential claimant
Maria Gonzalez Sanchez
555 Capitol Mall, Suite 1245
Sacramento, CA 95814


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18 Dated: 3/30/2021

/s/ Allen N. Sawyer
ALLEN N. SAWYER
Attorney for potential claimant
Jose Luis Mendoza Castillo
4578 Feather River Drive #D
Stockton, CA 95219

(Signatures authorized by phone)

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23 IT IS SO ORDERED.

24 Dated: April 12, 2021

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MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE